

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

OCLC, Inc.,

Plaintiff,

v.

**Baker & Taylor, LLC and Bridgeall
Libraries, Ltd.,**

Defendants.

Case No. 2:25-cv-00309

Judge Edmund Sargus, Jr.

**Magistrate Judge Elizabeth Preston
Deavers**

**[PROPOSED] AGREED SCHEDULE FOR PRELIMINARY
INJUNCTION PROCEEDINGS**

As directed by the Court during the April 9, 2025 preliminary scheduling conference, held under Local Rule 65.1, Plaintiff OCLC, Inc. and Defendants Baker & Taylor, LLC and Bridgeall Libraries, Ltd. submit the following proposed agreed scheduling order for resolving Plaintiff's Motion for Preliminary Injunction ("Motion").¹

Parties submit stipulated protective order	April 15, 2025
Parties formally serve discovery requests	April 25, 2025
Parties exchange written discovery responses	May 23, 2025
Document production substantially completed	June 27, 2025
Depositions completed	August 1, 2025
Defendants file opposition to Motion	August 15, 2025

¹ Defendant Baker & Taylor, LLC's responsive pleading deadline is May 26, 2025, and Defendant Bridgeall Libraries, Ltd.'s responsive pleading deadline is June 25, 2025. The parties will be prepared to discuss Defendants' responsive pleading deadlines and how they might affect the case schedule at the status conference on April 23, 2025.

Plaintiff files reply in support of Motion

August 29, 2025

Preliminary Injunction Hearing

Mid-September 2025

Respectfully submitted,

/s/ Jeffrey M. Walker

Jeffrey M. Walker (0096567), Trial Attorney
Traci L. Martinez (0083989)
Kathryn M. Brown (0100426)
Brittany Silverman (0102263)
Erin K. Hassett (0099970)
SQUIRE PATTON BOGGS (US) LLP
2000 Huntington Center
41 South High Street
Columbus, Ohio 43215
Telephone: (614) 365-2700
Facsimile: (614) 365-2499
jeffrey.walker@squirepb.com
traci.martinez@squirepb.com
kathryn.brown@squirepb.com
brittany.silverman@squirepb.com
erin.hassett@squirepb.com

Attorneys for Plaintiff OCLC, Inc.

/s/ Derek P. Hartman (with approval)

Derek P. Hartman (0087869), Trial Attorney
Michael C. Cohan (0013542)
CAVITCH, FAMLO & DURKIN CO., L.P.A.
1300 East Ninth Street, 20th Floor
Cleveland, Ohio 44114
Telephone: (216) 621-7860
Facsimile: (216) 621-3415
mcohan@cavitch.com
dhartman@cavitch.com

Frank E. Noyes, II (*pro hac vice* forthcoming)
OFFIT KURMAN
222 Delaware Avenue, Suite 1105
Wilmington, Delaware 19801
fnoyes@offitkurman.com

Nafiz Cekirge (*pro hac vice* forthcoming)
OFFIT KURMAN
Court Plaza South, West Wing
21 Main Street, Suite 158
Hackensack, New Jersey 07601
nafiz.cekirge@offitkurman.com

*Attorneys for Defendants Baker & Taylor, LLC
& Bridgeall Libraries Ltd.*

CERTIFICATE OF SERVICE

On April 17, 2025, this document was filed electronically with the Clerk of the United States District Court for the Southern District of Ohio, Eastern Division, which will electronically serve a copy of the foregoing on all counsel of record for all parties.

/s/ Jeffrey M. Walker

Jeffrey M. Walker, Trial Attorney